

REMARKS

Claims 1 to 23 were pending in the application at the time of examination. Claims 1 to 5, 10 to 15, and 20 to 23 stand rejected as anticipated. Claims 6 to 9 and 16 to 19 stand rejected as obvious.

Applicant has amended the description to correct grammatical errors and to replace pronouns with nouns.

Claims 1, 11, and 21 originally recited:

retrieving a bitmap from a cache, when the bitmap generates a match with an image selected for display on said output device;

For a bitmap to generate a match with an image, the bitmap and image are compared as taught in the description for example by bitmap match check operation 350. Therefore, when Claims 1, 11, and 21 were interpreted in view of the specification, this comparison was inherently present in the recited claim language, and should have been considered by the Examiner. Nevertheless, Applicants have amended Claims 1, 11, and 21 to recite:

comparing an image, selected for display on the output device, with bitmaps stored on a cache.

Since this phrase was inherent in the original claim language, this amendment does not affect the scope of the claim and so does not require consideration of new issues or a new search by the Examiner.

The remaining amendments to Claims 1, 11, and 21 correct informalities introduced by the explicit recitation of the comparing.

The amendments to Claim 4 and Claim 14 correct informalities as to the output device being referenced. Accordingly, these amendments do not affect the scope of the

claims and so does not require consideration of new issues or a new search by the Examiner.

The amendments to Claims 5, 6, 8, and 18 correct grammatical informalities and provide grammatical consistency among the Claims. These amendments do not affect the scope of the claim and so does not require consideration of new issues or a new search by the Examiner. Similarly, the amendment to Claim 23 corrects a grammatical informality that does not affect the scope of the claim.

The amendments to the preambles of Claims 9 and 19 more clearly recite the operation of the independent claim that is being further defined. Accordingly, these amendments do not affect the scope of the claims. Also, Claim 19 was amended to depend from Clam 18 to provide a proper antecedent basis for each element.

Claim 22 was amended to obtain consistency in capitalization of the word "Claim" among the claims. This amendment corrects a usage informality and so does not affect the scope of the claim.

Claims 1 to 5, 10 to 15, and 20 to 23 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,592,594 to Cahoon, hereinafter Cahoon. In the rejection of Claims 1 and 11, the Examiner stated in part:

. . . Cahoon **discloses** (emphasis in original) a method for retrieving images for display on an output device(printer 10), said method comprising: retrieving a bitmap from a cache(character cache 26) when the bitmap generates a match with an image selected for display on said output device(printer 10)(..font character data is maintained in a cache memory in bit map form...during a print operation...character cache 26 is searched...if a match is found...a pointer to character cache 26 is returned...col. 1, lines 55-56; col. 3, lines 1-15); and storing in the cache a bitmap representing the selected image, if the selected image does not generate a match with any bitmap stored on the cache(character cache 26) (...if a match is not found...signifying that the character is not in character cache 26...to make room in character cache area 26 for the new character data...col. 3, lines 15-21).

Applicant respectfully traverses the anticipation rejection of Claim 1. Cahoon teaches:

During a print operation, CPU 12, in conjunction with the printer personality software, places a call for a specific character to be used in the print action. In response, character cache 26 is searched to determine if the requested character is in cache 26. The search is carried out by examining a linked list of character ID structures in character cache 24 to determine if an entry is present with an identical value to the character ID of the character being searched. . . . (Emphasis added.)

Cahoon, Col. 3, lines 1 to 9. Thus, the cache of Cahoon is searched for "an entry . . . with an identical value to the character ID of the character being searched."

Matching character IDs as in Cahoon fails to teach or suggest

comparing an image, selected for display on the output device, with bitmaps stored on a cache

as recited in Claim 1. In fact, comparing character IDs teaches away from comparing an image with bitmaps and so fails to suggest or disclose Applicant's invention as recited in Claim 1.

Applicant respectfully traverses the anticipation rejection of Claims 2 to 5 and 10. Claims 2 to 5 and 10 include the novel features of Claims 1, and so distinguish over Cahoon for at least the same reasons as Claim 1. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of Claims 2 to 5 and 10.

Claims 6 to 9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,992,594 to Cahoon in view of U.S. Patent No. 5,515,081 to Vasilik. The Examiner stated in part:

. . . Vasilik **discloses** (emphasis in original) in the realm of bitmaps being employed for software developments whereby object modules are linked with other object modules similar to the linked list data structure having length elements.

Applicant respectfully traverses the rejection of Claim 6. Applicant first notes that even if the Examiner's characterization of the teachings of Vasilik are correct, the characterization fails to correct the deficiency in the primary reference as noted above with respect to Claim 1 and incorporated herein by reference. Therefore, Claim 6 is patentable over the combination of references.

In addition, Applicant respectfully submits that the Examiner has mischaracterized the teaching of Vasilik. Vasilik stated:

By way of review, it is helpful to understand conventional methods by which bitmaps are employed in software development. Bitmaps and other "resources" (e.g., icon, menu, dialog, string, and the like) are typically stored in a special part of the program or executable file called the resource section. This is typically done during the **"link" phase of program creation**, (emphasis added) when the object modules (i.e., source code which has been compiled into "object code") defining the program are combined or linked with other object modules, libraries, and resource files for creating the final binary image which defines the program. Each resource file used in the link is typically a binary file created by compiling one or more files which define bitmaps, icons, menus, dialogs, strings, and the like.

Vasilik, Col. 2 lines 19 to 22.

This portion of Vasilik describes a "link phase" used in program creation for a particular processor. Vasilik goes on to make this unmistakably clear by stating:

Shown in further detail in FIG. 2C, the development system 250 of the present invention includes an compiler 253, a linker 280, and an interface 255. Through the interface, the developer user supplies source modules 261 to the compiler 253. Interface 255 includes both command-

line driven 259 and Integrated Development Environment (IDE) 257 interfaces, the former accepting user commands through command-line parameters, the latter providing menuing equivalents thereof. From the source code 261 and headers/includes files 251, the compiler 253 "compiles" or generates object module(s) 263. In turn, linker 280 **"links" or combines the object modules 263 with libraries 271, 273 to generate program(s) 265, which may be executed by a target processor (e.g., processor 201 of FIG. 2A).** (Emphasis added.)

Vasilik, Col. 4, lines 54 to 67.

The fact that particular bitmaps are used in resources supplied to the "linker" fails to teach or suggest anything concerning a linked list, or characteristics of a linked list.

In addition, the Examiner has failed to explain how a linker that is used to link object modules would be used inside the printer of Cahoon so that Cahoon still works for its intended purpose. The MPEP requires that the proposed modification cannot render the prior art unsatisfactory for its intended purpose. Applicant submits that typically, a printer is not used to link object modules.

In Claim 6, Applicant recites:

the cache comprises a linked list data structure having length elements.

Linking object modules fails to suggest or disclose anything concerning a cache structure. Accordingly, the obviousness rejection of Claim 6 is not well founded at multiple levels. Applicant respectfully requests reconsideration and withdrawal of the obviousness rejection of Claim 6.

Claims 7 to 9 depend from Claim 6 and so distinguish over the combination of references for at least the same reason as Claim 6. Applicant respectfully requests reconsideration and withdrawal of the obviousness rejection of Claims 7 to 9.

Claim 11 stands rejected as anticipated for the same reason as Claim 1. Claim 11 includes the language quoted above

with respect to Claim 1. Therefore, the above remarks concerning Claim 1 are directly applicable to Claim 11 and are incorporated herein by reference. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 11.

Applicant respectfully traverses the anticipation rejection of Claims 12 to 15 and 20. Claims 12 to 15 and 20 include the novel features of Claims 11, and so distinguish over Cahoon for at least the same reasons as Claim 11. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of Claims 12 to 15 and 20.

Claim 16 stands rejected as obvious for the same reason as Claim 6. Claim 16 includes the language quoted above with respect to Claim 6. Therefore, the above remarks concerning Claim 6 are directly applicable to Claim 16 and are incorporated herein by reference. Applicant requests reconsideration and withdrawal of the obviousness rejection of Claim 16.

Applicant respectfully traverses the obviousness rejection of Claims 17 to 19. Claims 17 to 19 depend from Claim 16 and so distinguish over the combination of references for at least the same reason as Claim 16. Applicant respectfully requests reconsideration and withdrawal of the obviousness rejection of Claims 17 to 19.

Claim 21 stands rejected as anticipated for the same reason as Claim 1. Claim 21 includes the language quoted above with respect to Claim 1. Therefore, the above remarks concerning Claim 1 are directly applicable to Claim 11 and are incorporated herein by reference. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 21.

Applicant respectfully traverses the anticipation rejection of Claim 22. Claim 22 includes the novel features of Claims 21, and so distinguishes over Cahoon for at least the same reasons as Claim 21. Applicant respectfully requests

reconsideration and withdrawal of the anticipation rejection of Claim 22.

In the anticipation rejection of Claim 23, the Examiner stated "Regarding claim 23, it is similar in scope to claim 4 above and is rejected under the same rationale." In the rejection of Claim 4, the Examiner stated:

. . . Cahoon **discloses** (emphasis in original) wherein said method further comprises: including the unique identifier of a bitmap stored in the cache in a file (character data structure, Figure 2...character data is stored in the form...col. 2, lines 58-65)

Applicant respectfully traverses the rejection of Claim 23. Applicant respectfully submits that the examiner has mischaracterized the teaching of Cahoon. The information relied upon by the Examiner is describing the cache structure and not a file structure. Specifically, Cahoon stated:

**Each character record in character cache 26 includes** (emphasis added) a character ID field 40 . . . field area 42 includes a page designation . . . Character data 44 may be either full character raster data or may be outline data which is yet to be rasterized.

Cahoon, Col. 2, lines 57 to 66. Therefore, the information relied upon by the Examiner teaches a cache character record.

Claim 23 recites:

An output file format comprising:  
a cache section . . . ; and  
a data section . . .

A cache character record fails to suggest or disclose a two section output file format. In addition, the Examiner has failed to cite any teaching that the cache of Cahoon is included in an output file. Therefore, the Examiner has failed to establish that Cahoon teaches exactly the structure recited

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in the Claim 23. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 23.

Claims 1 to 23 remain in the application. Claims 1, 4 to 6, 8, 9, 11, 14, 18, 19, and 21 to 23 have been amended. For the foregoing reasons, Applicant respectfully requests allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant.

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on July 10, 2003.

Respectfully submitted,



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Date of Signature